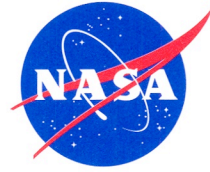


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

November 10, 2011



Reply to Attn of General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at a Reception hosted by Lockheed Martin, with the support of the National Institute of Aerospace Foundation (NIAF) and the American Institute of Aeronautics and Astronautics (AIAA) on November 14, 2011

On November 14, 2011, Lockheed Martin will host a Reception, with the support of the National Institute of Aerospace Foundation (NIAF) and the American Institute of Aeronautics and Astronautics (AIAA), both of which are non-profit organizations under section 501(c)(3) of the Internal Revenue Code, at Manchester Grand Hyatt, in San Diego, California.

Approximately 130 people are expected to attend. The estimated cost of the event including all food and beverages is \$19.00 per person. This reception is being held after the first day of NASA's Human Space Exploration Community Workshop, which will take place November 14-16, 2011. The reception will provide a forum to continue discussions on NASA's effort to broadly introduce the International Space Exploration Coordination Group's (ISECG) Global Exploration Roadmap (GER), which will be the focus of the Exploration Workshop. The reception will be attended by international space agencies, representatives of the aerospace industry, academia, other non-profit organizations, and other Federal agencies. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the event. The non-career employees will need to reimburse the cost of what they consume.

However, NASA employees whose duties may substantially affect the sponsors such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490, may only attend the reception if they reimburse the sponsors the cost of the refreshments consumed.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone